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3. The impact of disposal of removed material on biological resources

The amount of dirt and rock that would need to be removed during the tunneling process is massive, yet there is no description of where this material would be disposed of and how this will affect terrestrial or aquatic biological resources.

4. Location and frequency of surface boring holes

Presumably, there will be some pre-excavation investigation of subsurface geologic conditions using boring machines from the surface, but there is no mention of how these operate, what ground-level disturbance is required, and how these machines will get into and move around the remote and extremely rugged backcountry of the Diablo Range or the Tehachapi Mountains. The following excerpts from the DEIR/S say that these areas may pose excavation difficulties, but no detailed information is presented on what alternative construction techniques might be used and how these difficulties might affect biological resources. The Draft states,

Construction of mountain crossings for both the Modal and HST Alternatives would be constrained by existing unstable slopes and areas of difficult excavation. The tunnels proposed under the HST Alternative would pose **additional design and construction issues** because of difficult excavation conditions." (DEIR/S at 3.13-8) (emphasis added)

and,

Subsurface geologic conditions will largely determine the ease or difficulty of excavation, which will in turn indicate the appropriate excavation technique for use in various areas. For instance, hard unfractured bedrock may be difficult to excavate using bulldozers and other earthmoving equipment, or too resistant to tunneling using a tunnel boring machine; in these areas, blasting may be required. On the other hand, fractured rock that contains groundwater can also be difficult to excavate using tunneling methods. Faulted material can pose an additional challenge by contributing to instability at the tunnel face. (DEIR/S at 3.13-5)

It is critical that the DEIR/S describe the technical assumptions behind the construction of tunneling, as they relate to the overall feasibility and cost of the project and the potential biological impact of system construction and operation.

B. Lack of Description and Analysis of Construction Activities for Aerial Structures

Like tunneling, use of aerial structures is often cited in the DEIR/S as a way to avoid biological impacts, particularly to aquatic systems, but there is no description or analysis of the impacts stemming from the construction and use of these structures. There are no criteria presented in the DEIR/S for which surface water bodies would be spanned with aerial structures and which would be filled, diverted or run through culverts.

The DEIR/S presumes that bridges will be used to avoid impacts to aquatic resources: "**it is expected** that streams and rivers **would largely be** spanned by bridges (culverts also can be used) to minimize potential impacts on the flow and water quality of these hydrologic resources", but meaningful analysis is deferred until later, "potential impacts on water quality from surface runoff or erosion during project construction would be identified during the project-specific analysis and the design phase, and standard BMPs would be used to minimize potential impacts." (DEIR/S at 3.14-9) (emphasis added) This deferral of analysis is unacceptable for a project of this magnitude, and the DEIR/S should be revised to document what construction techniques will be used to avoid degradation of these resources, and what specific mitigation strategies would be used in cases where impacts cannot be avoided.

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Our analysis using the GIS data of proposed alignments provided by the CHSRA shows that many intermittent and perennial streams and rivers are crossed by alignments with the "At-grade" construction designation and not "Aerial" or "Aerial-g", suggesting that either the data used for the DEIR/S are not accurate or that significant disturbance to water bodies and riparian vegetation and wildlife communities would be unavoidable from HST construction and operation.

C. Inadequate Description and Analysis of Construction Activities to Upgrade Existing Rail for HST

It is assumed throughout the document that impacts along parts of the HST system that use existing rail lines will have minimal impacts because a broader footprint is not required for HST operation. While plausible, there needs to be some description of how rail lines will be upgraded to give the public and decision-makers an understanding of the level of disturbance, habitat alteration and use of water resources. These details figure into the overall cumulative impact on biological resources and cannot be omitted from a Program-level DEIR/S.

D. Inadequate Description of Maintenance Infrastructure and Activities

The Draft contains no information about what maintenance infrastructure or activities will be conducted as part of the HST system maintenance. For example, there is no information about what roads would need to be built and maintained to access parts of the line, what level of vegetation management would be necessary to keep rights-of-way clear in natural areas, or whether any herbicides would be used to manage vegetation.

III. Inadequate Analysis of Direct, Indirect and Cumulative Impacts of HST System

A. Deferment of Detailed Analysis to Project-Level

While a program-level EIR/S is essential to tiering environmental review for a large project such as this, an adequate amount of information and analysis is essential to choose among alternatives or to choose station and alignment options within the HST alternative. Unfortunately, the DEIR/S has not met this standard at either level. It is imperative that an agency preparing an EIR/S use appropriate, accurate and current data, choose the right type of analysis for the resource in question and consider the full range of direct, indirect and cumulative effects of the proposed action. Admittedly, this is a substantial undertaking for a project like this, as there are many unknowns and the geographic extent of the project covers very diverse ecological systems. Even so, CEQA guidelines mandate that an agency "must use its best efforts to find out and disclose all that it reasonably can." CEQA Guidelines § 15144

The fundamental problem with much of the impact analysis for biological resources is that it aims for a minimal analysis by using easily accessible statewide GIS layers to answer the question, *what sensitive and special status species and habitats are within a mile (at most) of the proposed HST alignments?*

While this is a critical basic question to answer in an EIR/S, it is also essential to attempt to answer the question, *how will construction and operation of the high-speed train impact ecosystem functioning, special-status species viability, and persistence of sensitive vegetation types?* This requires an additional level of effort in data collection, review of published scientific literature and incorporation of ecological principles in the preparation of the DEIR/S; decision-makers and the public cannot understand the scope of impacts if the document does not meet this higher standard for disclosure and analysis.

It seems that CSHRA and FRA felt justified in deferring analyses because this is a Program-level EIR/S; and that once modal and alignment decisions are made after this review, site-specific analyses will characterize the full environmental impact. For example, the Draft states,

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Identification of potential impacts on various biological resources for this Program EIR/EIS has primarily relied on the available GIS database, other GIS tools, and review of available literature. These sources encompass a broad range of information that may not exactly correspond to actual field conditions. Project-level studies would be required to obtain more reliable assessments of potential impacts on biological resources in the study area.

The subsequent biological resources analyses required for project environmental documentation would focus on project-specific impacts that reflect more precise definitions of the right-of-way, the proposed facility locations, and the operations. (DEIR/S at 3.15-31)

The problem with this logic is that cumulative impacts cannot, by definition, be analyzed at a project or site-specific scale; they need to be analyzed at a system-wide scale. In another instance, the DEIR/S says that a program-level EIR/S does not need to be a complete analysis of impacts, just a representative one.

The biological resources and wetlands described above in the affected environment section (Section 3.15.2) characterize the existing conditions in the five regions potentially affected by the alternatives, drawing primarily from existing available data, with gaps in data in some areas. Because this is a program-level analysis, data are representative rather than complete, and are for comparison purposes. (DEIR/S at 3.15-17)

Elsewhere, in the Bakersfield – L.A. Biological Resources Technical Evaluation, the discussion of deferred analysis is more striking. “Temporary and permanent impacts to biological resources and jurisdictional waters and wetlands will be determined on a project-level basis with the use of project specific biological survey and mapping data and final as-built project plans.” (p. 63) Unfortunately, the selection of either modal or alignment alternatives is not justified without an adequate level of detail or analysis.

B. Use of Best Available Data

TNC believes that in order to adequately determine the impact of the proposed actions, the DEIR/S is required under CEQA and NEPA to use the most current and appropriate data available. The reliance on data sets such as the California Natural Diversity Database (CNDDDB) to determine the true extent of direct and cumulative impacts is insufficient for many wildlife and plant species. This is especially true in areas that are typically undersampled in the database due to remoteness or lack of publicly accessible land. The CNDDDB, and any database of observational data, is going to be seriously limited for analyzing impacts on less widely distributed species, as it documents only occupied habitat, not potential habitat. In addition, CNDDDB only maps occupied habitat where somebody has surveyed and sent the survey results into the program. This is likely a small percentage of the full distribution of many species. For many listed species, there are other key sources of data that were only partially used in the DEIR/S including Natural Community Conservation Plan (NCCP), Habitat Conservation Plan (HCP), Multiple Species Conservation Plan (MSHCP) reserve designations, designated critical habitat, recovery plans, and habitat suitability models like the GAP analysis project predicted distribution layers generated from the California Wildlife Habitat Relationship (WHR) models.

Use of suitable wildlife habitat models (e.g. WHR) and data created to represent other high quality habitat (e.g. via critical habitat designation or NCCPs) to analyze the effect of the proposed action on sensitive wildlife habitat and movement linkages would facilitate more meaningful interpretation of direct and cumulative impacts. For example, the DEIR/S needs to quantify the percent of suitable habitat that is lost, fragmented and degraded as a result of the construction and maintenance across the full distributional range of the species, factoring in the other threats to species viability. This is the minimum necessary to characterize the cumulative impact on rare or sensitive wildlife. The DEIR/S needs to consider not just

the amount of lost habitat within the narrow study area, but the change in spatial configuration of habitat and the loss of effective habitat as a result of factors such as noise, light and associated maintenance infrastructure. Without such an analysis, decision makers cannot make a determination of which alternatives are the least environmentally damaging.

C. Inadequate Analysis of Wildlife Habitat Fragmentation

Based on the information presented, one of the most significant long-term ecological impacts of the HST project will be the fragmentation of wildlife habitat and isolation of species. Over time, the negative effect on population viability from fragmentation of habitat could be extreme for some wide-ranging or migratory species, such as pronghorn, mountain lion, and San Joaquin kit fox. At a finer scale, the fenced rail corridor may block access to critical habitats necessary during a portion of a species life cycle. (e.g. wetlands for amphibians). The isolating effect will be greatest in areas where the rail corridor bisects large, relatively intact landscapes, like the Diablo Range in the Bay Area and the southern Sierra Nevada along State Route 58. Given how little intact low-elevation habitat remains in California for wide-ranging species, it is scientifically unjustifiable to consider further fragmentation when other alternatives exist for alignments in and around existing developed areas.

The DEIR/S cites the Missing Linkages data as the source for wildlife habitat linkages that was used to characterize what species would be negatively affected by the proposed alignments, yet it only used the data set for the L.A. – Bakersfield technical report. It is essential that an assessment of wildlife habitat fragmentation along the whole HST system be conducted using this statewide data set. Even this, however, would be appropriate only as an initial assessment, because the Missing Linkages data is, in many cases, only a best guess as to where wildlife are moving between suitable core habitat areas. Further habitat connectivity modeling and field studies are necessary before the impact of a fenced rail corridor can be adequately assessed. As mentioned earlier, analysis of suitable habitat that would be fragmented by the rail corridor and incorporation of population locations and recovery plan demographic data is the only meaningful way to assess the impact of fragmentation.

The DEIR/S makes some statements about wildlife movement that are contradictory for the same species, bringing into question the level of expertise for much of the interpretation. For example, when discussing the movement patterns of the San Joaquin kit fox, the DEIR/S states, “The kit fox has a wide distribution, using the spine of the Diablo Range as a north-south movement corridor.” (DEIR/S at 3.15-21) and in the Bay Area – Merced Technical evaluation. “On the west side of the Great Valley the relatively extensive strip of annual (non-native) grassland, which lies between the irrigated fields and orchards of the valley floor and the oak and pine woodlands of the Diablo Range, constitutes a major movement corridor for San Joaquin kit fox.” (p. 56) Given the strong habitat preference of kit fox in flat or low relief areas, TNC believes that it is unlikely that San Joaquin kit fox are moving along the spine of the Diablo Range.

The issue of fencing is an extremely important aspect of HST design that was largely absent from the discussion of wildlife impacts. The only details of the fence design and extent that we could find was in the Capital Costs Appendix (4-c, page 10).

This is a security chain link fence 2.5m (8.2 ft) in height along the right-of-way. All at-grade sections, trench sections, cut and fill sections, tunnel portals, maintenance areas, and any other areas where tracks are accessible to public would be fully fenced. A unit cost for fencing was applied per length of alignment and includes fencing for both side of right-of-way.

There is no analysis of how much of the route will be fenced, which species will likely be affected, or whether overpass pilings and support beams will also be fenced. It is unclear from the DEIR/S if wildlife behavior was factored into the fencing design because many species, including mountain lion, can easily

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jump higher than 8 feet. Given that this is an extremely significant impact on wildlife movement, more information about fencing design and potential mitigation strategies should be included in a revised DEIR/S.

D. DEIR/S Does Not Consider Basic Ecosystem Functioning

The DEIR/S primarily uses coarse, statewide GIS layers (such as GAP vegetation data) to quantify the resources affected within the .5 – 1 mile swath along the proposed rights-of-way and from that characterizes the degree of impact. This approach is limited in its ability to fully assess the degree of alteration that would result from HST construction and operation, because it ignores the underlying ecological processes that create the (somewhat dynamic) patterns of biodiversity expressed in GIS data. Processes such as nutrient flow, natural disturbance, pollination, predation, genetic interchange, surface and groundwater flow all interact to sustain communities of species over time.

While little spatial data exists to characterize the dynamics of these processes, published studies and experts should be used to assess the impact of a significant fragmenting feature such as a rail corridor. The spatial scale at which ecological processes operate is widely variable and any interpretation of the impact of HST on biological resources needs to factor in the effective "area of influence" for the resources in question. For example, a wetland can be filled and impacted directly by HST if it overlaps with the rail line, but a wetland can also be affected miles away from the rail line if upstream changes in surface and groundwater flow result from HST construction and operation.

Key issues that need to be addressed in a revised DEIR/S include:

1. How the presence of the HST system will affect the movement and management of fire in fire-adapted ecosystems and on public land
2. An analysis of the wetland – groundwater relationships that would be affected by HST
3. What vegetation communities will be affected by changes in microclimate, soil moisture, and seed and nutrient sources resulting from altered hydrologic and wind regimes, soil compaction and loss of canopy vegetation in forests and riparian areas in the right-of-way
4. What chemicals will be used during construction, operation and maintenance and how these may affect biological resources through soil and water pollution
5. Detailed analysis of the effects on riparian vegetation and associated fauna from presence of rail corridor near streams and rivers
6. An analysis of the effect of changes in sediment deposition and water temperature on salmon and steelhead populations

E. Significant resource impacts not addressed in DEIR/S

Invasive species

One of the primary global threats to biodiversity is the spread of non-native, invasive species into ecosystems. Given the seriousness of this threat, it is unacceptable that there is no discussion of the potential spread of invasive species posed by HST construction and operation, particularly in remote areas without any major human infrastructure (e.g. Diablo Range). Extensive research in road right-of-ways shows that opportunistic invasive species often outcompete native plants, following soil and canopy disturbance. These disturbances increase rates of establishment due to changes in light and moisture availability. Railroads, like roads, are an extremely efficient distribution mechanism for invasive species, and seeds may be transported on construction and maintenance equipment, and possibly trains

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themselves. A revised DEIR/S must factor in the current distribution of invasive species along the route and consideration of the ecological effect the spread of these species in terrestrial and aquatic ecosystems would have on native biodiversity.

Noise, vibration and light effects on wildlife

The increased noise resulting from the HST system was not analyzed for its effect on wildlife. In numerous studies along roads, birds and mammals show reduced breeding success, changes in movement patterns and altered behavior along roadways. The primary factors related to noise impacts are the amount of traffic and the presence of mitigating factors such as barrier walls. Oddly, the noise impacts on animals are casually referenced in the DEIR/S, but there is no analysis of which species or areas would be most affected in section 3.4 (Noise and Vibration).

At 3.15-4 the Draft states, "To account for potential indirect impacts on biological resources that could result from project-related noise, light, or shadows, as well as other disruption to or physical separation of habitat areas, the biological resources study area is larger than the footprint of either the Modal or HST Alternative..." Again at 3.17-9, "The potential for indirect noise effects on biological resources is addressed in Section 3.4, Noise and Vibration." Yet, in section 3.4, noise impacts on wildlife are mentioned fewer than five times with regard to HST, and never with any specifics. The DEIR/S needs to address noise impacts in a revised document.

Similarly, increases in light at night and vibration reduce habitat quality for many species including waterfowl, amphibians, and nocturnal mammals. These issues need to be analyzed in a revised DEIR/S at the scale of the whole system, not at the project scale.

F. Cumulative impacts and growth inducement analyses are inadequate

TNC believes that both NEPA and CEQA mandate that cumulative impacts be assessed within an EIR/S. As mentioned above, the analysis of cumulative impacts needs to be thoroughly conducted at this stage in the environmental review, not at the project level. The section of the DEIR/S dealing with cumulative impacts (3.17) defers any meaningful, quantitative analyses to project-level review, but does say that cumulative impacts are likely:

During project-level environmental review, field studies would be conducted to verify the location, in relation to the HST alignments, of sensitive habitat, wildlife movement corridors, and wetlands. These studies would provide further opportunities to minimize and avoid potential impacts on biological resources through changes to the alignment plan and profile in sensitive areas. For example, the inclusion of design features such as elevated track structures over drainages and wetland areas and wildlife movement corridors would minimize potential impacts to wildlife and sensitive species. However, when combined with the potential impacts of other highway, water, and conventional rail projects in the five regions, the HST Alternative would contribute to potential cumulative impacts on biological resources. (DEIR/S at 3.17-9)

To say that cumulative effects are likely without any attempt to determine which biological resources are most at risk and what mitigation strategies will be used to avoid cumulative impacts does not, in TNC's opinion, comply with NEPA or CEQA. Generalizations about impacts cannot take the place of quantitative analysis. An example of such a vague statement is: "The HST Alternative would generally be located within or adjacent to existing transportation corridors or would be in tunnel or elevated through mountain passes and sensitive habitat areas". (DEIR/S at 3.17-9)

Based on a GIS analysis by TNC, we believe that this above statement is misleading. Data acquired from the CHSRA show that there are at least 250 miles of proposed route, along all of the potential HST alignments, that are more than a half mile from an existing highway (i.e. not near existing transportation

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corridor) and are designated a "new alignment" and "at-grade" (i.e. not in tunnels or elevated.) Much of these proposed alignments go through the Diablo Range and TNC's Mount Hamilton project area, one of the last large, intact low elevation landscapes with a large proportion of private land in California.

An analysis of the potential indirect and cumulative effects from growth inducement resulting from HST construction needs is missing in the DEIR/S. The increased commuting mobility that HST will enable will likely catalyze significant growth and expansion of the developed footprint for many cities and towns, particularly in the Central Valley. The station location in Los Banos is the most striking example of this potential, given that the area is near the Grasslands Ecological Area and the proposed station is almost 10 miles from the town of Los Banos. Another example of how HST will catalyze growth is in Palmdale, where support for the alignment that runs through their city has been the subject of recent popular media stories.⁵ The DEIR/S needs to analyze the potential impact on projected growth in these areas on listed species habitat, wildlife movement and water resources.

A revised cumulative impacts analysis must quantify all direct, indirect, and cumulative impacts to natural resources, factoring in the full range of other threats posed to species and community viability by other transportation projects across the range of the species at the scale of the whole HST system.

G. Inconsistent regional technical evaluations

TNC believes that CEQA and NEPA mandate that information for each alternative be analyzed consistently at the same level of detail with information presented in a consistent format. The Biological Resource Regional Technical Evaluations not only present information in very different formats, but also present different information. Oddly, some datasets that are statewide in extent (e.g. Missing Linkages) were used only for some regional studies. This prevents the DEIR/S reader from being able to fully understand the full range of impacts and to make an informed decision about what alternative is in the best interests of California's people and ecosystems. A few examples of these inconsistencies include:

- The Bay Area-Merced technical evaluation does not even address wildlife linkages, while Bakersfield-L.A. does quite a bit.

- The maps in the Los Angeles-San Diego and Bakersfield-L.A. technical evaluations are much more detailed than the other regions.

- The Bay Area-Merced evaluation did not address stations or tunnel portal impact at all. "We did not analyze 0.25 mile buffers around stations and alignments in undeveloped areas (or 0.50 acres in the vicinity of estuaries and lagoons) since engineering data were not available for stations or tunnels at the time of writing of this document." (BA – Merced BRTE, p. 59)

A consistent set of data and a template for the formatting and presentation of information on impacts should be standardized in a revised DEIR/S. It is critical that the same map data and scale be used on a consistent set of maps for the whole HST system.

Related to the issue of consistent regional analyses is the need for an assessment of an Altamont Pass mountain crossing. For many reasons, both economic and biological, we feel that an Altamont HST alternative needs to be analyzed at the same level as the other northern mountain crossings. Without a consideration of this alternative, the DEIR/S clearly does not include a full range of reasonable alternatives.

⁵ "Palmdale on Board with High Speed Rail Plan" Los Angeles Times, August 9, 2004

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IV. Inadequate Discussion of Mitigation Alternatives

Like other sections, the Draft section on mitigation contains no details about the steps that would be taken in specific areas and which affected resources would be targeted. There is no assessment of the cost, feasibility and likelihood of success for the general actions proposed. For some species and resources that will be severely or broadly affected, mitigation needs to be assessed at the level of the whole HST system, not at a project-level. Vague statements about mitigation suggest a piecemeal approach to mitigation that will focus on design and alignment tweaks for specific segments, rather than system-wide analysis. An example of this is quoted below:

For example, to avoid or minimize impacts in sensitive areas, alignment plans and profiles could be adjusted or proposed structures could be constructed above grade or in tunnels...Special mitigation needs would be considered in the future with the appropriate authorities that are responsible... (DEIR/S at 3.15-31)

Feasible mitigation measures must be identified and in the case of more detailed decisions concerning HST alignments and stations, additional details concerning these project descriptions must be provided. It is not appropriate to make an alignment choice based on the possibility that significant impacts to biological resources may potentially be avoided by as yet undetermined mitigation. Mitigation options, such as overpasses and tunneling, may prove to be infeasible.

The DEIR/S should also analyze the "net benefit" mitigation options that could opportunistically coincide with the construction of a HST system. In a project this massive in scope, there will undoubtedly be opportunities to improve wildlife habitat connectivity at existing chokepoints, improve aquatic habitat connectivity for migratory fish and restore a functional tidal influence for coastal lagoons and wetlands. These actions should be considered mitigation options that construction of HST would enable and should be identified early in the review process.

The cost of proposed mitigation options should be factored into the overall feasibility of the project, especially considering the fact that many of the proposed routes traverse areas with high resource and land values. TNC could not find any quantified estimates of mitigation for unavoidable impacts in the DEIR/S. While it may be impossible at this stage to quantify the full cost of mitigation along all proposed alignment alternatives, more specifics on the cost, feasibility and likelihood of success are needed, especially for wetland mitigation and construction of wildlife underpasses and overpasses.

IV. Summary

TNC appreciates the opportunity to provide comments on the proposed HST project. We recognize the considerable challenge of meeting the transportation needs of a growing California, while maintaining the natural values that make California exceptional. TNC believes that we need to find creative solutions to these needs, and that the growth of our ecological infrastructure needs to run parallel to our expanding human infrastructure. Given the massive scope of this project and significant commitment of financial resources to carry out the proposed plans, the public and decision-makers need to be presented with a thorough and consistent analysis of the environmental impact of the project to assess the relative cost and benefit of a HST system.

Unfortunately, this standard for analysis has not been met in the DEIR/S as it does not fully factor in the full direct, indirect and cumulative impacts of the project. Many key aspects of the project, including

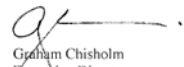
⁷ In a paper entitled, *Use of non-wildlife passages across a high speed railway by terrestrial vertebrates*, researchers in Spain found that many factors influenced the use of culverts and passageways including proximity to habitat, human disturbance and dimensions of the passages. They found that ungulates were not using the passages even though they are found throughout the area and that the railway was a movement barrier for these animals. In Rodriguez et al. (1999) *Use of non-wildlife passages across a high speed railway by terrestrial vertebrates*. *Journal of Applied Ecology* 33, 1527-1540.

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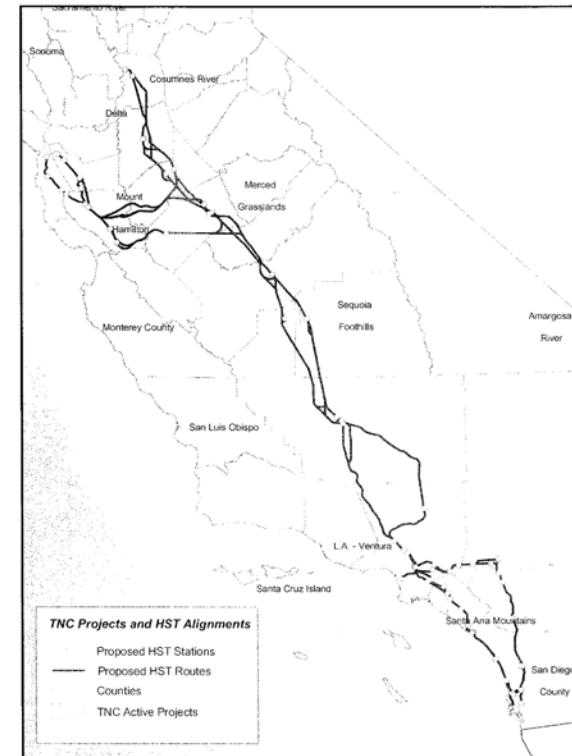
construction impacts, impacts to wildlife habitat connectivity, and impacts to fisheries, riparian areas and aquatic systems, have not been sufficiently analyzed. The deferment of these and other important analyses to a project-level review is not justified given the fact that many species, communities and ecological systems will be impacted across the full extent of the proposed HST system and will likely be subject to indirect and cumulative impacts. Mitigation options for unavoidable impacts have not been thoroughly analyzed for feasibility, likelihood of success, and additional overall cost to the project. Until this higher level of analysis and review is met, TNC believes that a decision regarding the most appropriate modal alternative to meet future transportation needs, let alone a decision on a preferred alignment for HST is not possible.

Thank you for considering and responding to our comments.

Respectfully,


Graham Chisholm
Executive Director
The Nature Conservancy of California

Attachment 1: Map of TNC projects in California Relative to HST alignments



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Attachment 2: List of Government/Conservation Land within two miles of Proposed HST Alignments

This analysis was conducted by the TNC Science department using *Public and Conservation Lands* (2003) GIS data acquired from California Resources Agency and the GIS layer of HST alignments. All properties within two miles of HST were selected and then filtered by TNC for those with potential value for biodiversity. Note: this dataset does not contain all TNC properties.

NAME	OWNERSHIP
SACRAMENTO COUNTY COSUMNES RIVER PRESERVE	CITY OF SACRAMENTO
No name	DEPT OF FISH AND GAME
ALLENSWORTH ER	DEPT OF FISH AND GAME
BAIR ISLAND ER	DEPT OF FISH AND GAME
BAKERSFIELD	DEPT OF FISH AND GAME
BATIKUITOS LAGOON ER	DEPT OF FISH AND GAME
BUENA VISTA LAGOON ER	DEPT OF FISH AND GAME
COSUMNES RIVER	DEPT OF FISH AND GAME
COTTONWOOD CREEK WA	DEPT OF FISH AND GAME
DWR MITIGATION-LA. PROPERTY	DEPT OF FISH AND GAME
FOX GROVE FA	DEPT OF FISH AND GAME
LE GRAND	DEPT OF FISH AND GAME
LOS BANOS WA	DEPT OF FISH AND GAME
REDWOOD SHORES ER	DEPT OF FISH AND GAME
SAN BRUNO MOUNTAIN ER	DEPT OF FISH AND GAME
SAN DIEGUITO LAGOON ER	DEPT OF FISH AND GAME
SAN ELIJO LAGOON ER	DEPT OF FISH AND GAME
SAN FRANCISCO BAY	DEPT OF FISH AND GAME
SAN JOAQUIN RIVER ER	DEPT OF FISH AND GAME
SANTA MARGARITA RIVER	DEPT OF FISH AND GAME
SCAMORE CANYON ER	DEPT OF FISH AND GAME
VOLTA WA	DEPT OF FISH AND GAME
WEST HILMAR WA	DEPT OF FISH AND GAME
CARDIFF SB	DEPT OF PARKS AND RECREATION
CARLSBAD SB	DEPT OF PARKS AND RECREATION
COLONEL ALLENSWORTH SHP	DEPT OF PARKS AND RECREATION
DOHENY SB	DEPT OF PARKS AND RECREATION
EAST BAY SHORELINE	DEPT OF PARKS AND RECREATION
HENRY W. COE SP	DEPT OF PARKS AND RECREATION
KENNETH HAHN SRA	DEPT OF PARKS AND RECREATION
LEUCADIA SB	DEPT OF PARKS AND RECREATION
MCCONNELL SRA	DEPT OF PARKS AND RECREATION
MOONLIGHT SB	DEPT OF PARKS AND RECREATION
PACHECO SP	DEPT OF PARKS AND RECREATION
PIO PICO SHP	DEPT OF PARKS AND RECREATION
PLACERITA CANYON SP	DEPT OF PARKS AND RECREATION
ROBERT W. CROWN MEMORIAL SB	DEPT OF PARKS AND RECREATION
SAN BRUNO MOUNTAIN SP	DEPT OF PARKS AND RECREATION
SAN CLEMENTE SB	DEPT OF PARKS AND RECREATION
SAN ELIJO SB	DEPT OF PARKS AND RECREATION
SAN LUIS RESERVOIR SRA	DEPT OF PARKS AND RECREATION
SAN ONOFRE SB	DEPT OF PARKS AND RECREATION

SOUTH CARLSBAD SB
STATE INDIAN MUSEUM
TORREY PINES SB
TORREY PINES SR

ALAMEDA CREEK REGIONAL TRAIL
ANTHONY CHABOT REGIONAL PARK
CROWN MEMORIAL STATE BEACH
DRY CREEK/PIONEER
GARIN REGIONAL PARK
GARIN/DRY CREEK REGIONAL PARK
MISSION PEAK REGIONAL PRESERVE
MLK REGIONAL SHORELINE
OYSTER BAY REGIONAL SHORELINE
VARGAS PLATEAU
GOLDEN GATE NRA
BAIR ISLAND
COSUMNES RIVER PRESERVE
RILEY ROAD
SHAW
VALENSIN RANCH H
VALENSIN W RILEY
DIABLO RANGE NWR
DON EDWARDS SAN FRANCISCO BAY NWR
MERCED NWR
PIXLEY NWR
SAN DIEGO NWR
SAN JOAQUIN RIVER NWR
ANGELES NF
LOS PADRES NF
CAMP PENDLETON MARINE CORPS BASE

DEPT OF PARKS AND RECREATION
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EAST BAY MUNICIPAL UTILITY
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NPS - NATIONAL RECREATION AREA
PENINSULA OPEN SPACE TRUST
STATE LANDS COMMISSION
THE NATURE CONSERVANCY
THE NATURE CONSERVANCY
THE NATURE CONSERVANCY
THE NATURE CONSERVANCY
US FISH AND WILDLIFE SERVICE
US FISH AND WILDLIFE SERVICE
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USDA FOREST SERVICE
USDA FOREST SERVICE
DOD - MARINE CORPS

Response to Comments of Graham Chisholm, Executive Director, The Nature Conservancy, August 31, 2004 (Letter O059)**O059-01**

Based on the issues raised in this comment and others, the Co-lead agencies are proposing to continue and supplement their evaluation of HST alignment options between the Central Valley and the San Francisco Bay Area (see standard response 6.3.1). Further investigation has been recommended to identify a preferred alignment option from within a broad corridor, which excludes alignment options through Henry Coe State Park and the Orestimba State Wilderness. The future study would consider alignment options between (and including) the Pacheco Pass Corridor (SR-152) to the south and the Altamont Pass Corridor (I-580) to the north. As part of this additional analysis, existing alignments (i.e., the Pacheco Pass and Northern Tunnel - North of Henry Coe State Park and the Orestimba State Wilderness) will be refined based on comments received from the public during the comment period on the PEIR/S. A conceptual alignment for Altamont Pass with design variations as appropriate will be developed. Public participation and interagency coordination will play a major role in the definition of alignment and design variations. This future study will discuss impacts that may still remain for these alignments and how cost, logistical, or technological constraints may preclude avoidance of impacts. The study will also evaluate the habitat and wildlife issues raised in this comment for all alignment options considered. Please see standard responses 3.15.2, 3.15.3, 3.15.4, 3.15.9, and 3.15.11, and responses to Comments AS004 – 46, 47, 48, 49, & 51, AS012 – 7, 8, 9, 12, & 17, and O034 – 3 & 4 regarding impacts to wildlife and wildlife corridors and habitat fragmentation.

O059-02

The following HST alignment options through areas identified in this comment have been dropped from further consideration: (1) Camp Pendleton, (2) Henry Coe State Park and the Orestimba State Wilderness, (3) Los Padres Forest & Angeles Forest, (4) San Dieguito

Lagoon Ecological Reserve, and (5) San Diego Wildlife Refuge. The HST alignment would be within the I-15 right of way, which is adjacent to the Santa Margarita River Ecological Reserve. Please see standard response 3.15.11 regarding HST alignments near the Santa Clara River. The project-level, Tier 2 studies will fully evaluate the potential impacts of the proposed HST system on the Santa Clara River valley. Please see standard response 3.15.2 and standard response 3.15.13 regarding the general level of detail in the PEIR/S, the subsequent project-level environmental analyses, and the intended uses of this PEIR/S. Project-level environmental analyses will include consideration of the River Enhancement and Management Plan as well as a detailed analysis of endangered animals and plants as recommended in the comment. Please see responses to Comments AL072 regarding the San Luis National Wildlife Refuge Complex (Grassland Ecological Area). As part of the additional analysis of alignment options between the Central Valley and Bay Area, the potential impacts to the Grasslands Ecological Area will be evaluated in more detail. This evaluation will use the information provided in several comments (including this one) to help define the scope and methodology, and to supplement data used in the analysis.

O059-03

Section 2.6 of the Final Program EIR/EIS describes the HST Alternative, the No Project Alternative, and the Modal Alternative. Chapter 3 describes potential environmental impacts associated with the HST, No Project, and Modal alternatives. Section 3.18 of the Final Program EIR/EIS addresses construction methods and the potential for construction impacts in general. In addition, each section of Chapter 3 also outlines “design practices” and features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. However, construction impacts are highly site-specific in nature. These issues will be addressed in detail during subsequent project level

environmental review, based on more precise information regarding location and design of the facilities proposed (e.g., specific alignment, right-of-way corridor width, elevated, at-grade, cuts and fills, etc.). The detail of engineering associated with the project level environmental analysis will allow the Authority to further investigate ways to avoid, minimize, and mitigate potential impacts.

O059-04

This comment helps frame the issues faced by the Co-lead agencies in deciding how to evaluate the potential environmental impacts of a project as large and extensive as the proposed statewide high speed train system. The Co-lead agencies believe that the impact evaluation procedures used in the analysis were appropriate for the PEIR/S and for the decisions that are being considered. Please see standard response to 3.15.13. In terms of cumulative impacts, the Co-lead agencies have evaluated system-wide effects for this PEIR/S. System-wide impacts would inform project-level, Tier 2 environmental analysis, which would involve collecting and evaluating data at the project level (e.g. detailed field surveys of biological resources) and analyzing this data both on the site-specific and cumulative basis. It should be noted that the general data reported in the PEIR/S for the system alternatives clearly indicates that the Modal Alternative would have more severe system-wide impacts than the HST Alternative, leading to the identification by the Co-lead agencies of the HST Alternative as the preferred alternative and as environmentally superior, given that it would have a lower overall level of adverse impacts. This analysis was based on the program-level data analysis and consistent evaluation methodologies for both alternatives. Unlike the HST system, highway and airport improvements like those in the Modal Alternative are typically implemented by numerous government agencies throughout the state in a loosely coordinated and piecemeal fashion. Project-specific environmental analyses prepared for these common types of highway and airport incremental expansions do not evaluate the overall cumulative impacts of these multiple projects across the state, as the type of analysis contained in the PEIR/S is beyond the scope of their responsibilities and are not required. The Co-lead

agencies are not “ducking” their responsibilities for preparing an environmental analysis that accurately evaluates the proposed high speed train system only to make a decision on whether to proceed with the project or not, but are rather using a structured and deliberate tiered approach to completing NEPA and CEQA analysis as accurately and efficiently as possible. The Co-lead agencies acknowledge that it is highly possible that there will be environmental impacts identified during the project-level, Tier 2 studies that will require refinements to alignments, development of alignment design options, and adoption of myriad mitigation measures; but the Co-lead agencies believe that this process is reasonable, appropriate, practical, and far more efficient than completing detailed environmental analysis of all possible alignment options before deciding to eliminate some alignment options from further evaluation. Please also see standard response 3.17.1.

O059-05

Please see standard response 3.15.2 regarding the level of detail for the biological evaluation and standard response 3.15.13 regarding the intended use of the PEIR/S. Please see standard response 3.15.10 regarding use of HCPs, MSCP, etc. Please see response to Comment O034 – 6 regarding noise and light impacts. The Co-lead agencies believe that the impact evaluation procedures used in the analysis were appropriate for the PEIR/S. The project-level, Tier 2 studies will address the issues raised in this comment, including the use of more detailed habitat information and models.

O059-06

Please see standard response 3.15.9 regarding impacts and mitigation to wildlife corridors, habitat fragmentation, and use of fencing. Please see standard response 3.15.5 regarding the portion of the HST alignments within or adjacent to existing transportation rights-of-ways and/or within a tunnel. Please see response to Comments AS012 – 7 and O034 – 19 regarding the Missing Linkages information.

O059-07

Please see standard response 3.15.7 and response to Comment O044 – 27 regarding the envelopes used for the biological analyses. Please see standard response 3.15.2 regarding the level of detail for the biological evaluation and standard response 3.15.13 regarding the intended use of the PEIR/S. Project-level, Tier 2 studies will include consideration of the data sources, methodologies, and issues described in this comment. As the comment acknowledges there is little geo-spatial data available to characterize the dynamics of ecosystem functioning and the spatial scale upon which ecological process function is widely variable. The Co-lead agencies also acknowledge the importance of evaluating the issues outlined in the comment in future studies, especially as part of project-level, Tier 2 evaluation, when more information will be available describing specific alignments and design options.

O059-08

Please see response to Comment AS004 – 45 regarding invasive species. Please see response to Comment O034 – 6 regarding noise, vibration, and light impacts on wildlife.

O059-09

See Standard Response 3.17.1.

O059-10

The Co-lead agencies have decided to prepare further investigation of the broad corridor between the Central Valley and Bay Area including additional evaluation of the Altamont Pass alignment as requested in this comment. Please see standard response 3.15.7 regarding anticipated future studies of the Altamont pass. See Section 3.18 of the Final Program EIR/EIS concerning potential construction methods and impacts.

O059-11

In the Final Program EIR/EIS, each environmental area (sections of Chapter 3) has been modified to include mitigation strategies that would be applied in general for the HST system. Each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. Specific impacts and mitigations will be addressed during subsequent project level environmental review, based on more precise information regarding location and design of the facilities proposed. The detail of engineering associated with the project level environmental analysis will allow the Authority to further investigate ways to avoid, minimize, and mitigate potential impacts. Only after the alignment is refined and the facilities are fully defined through project level analysis, and avoidance and minimization efforts have been exhausted, will specific impacts and mitigation measures be addressed.

O059 Attachment 2

This list is noted for consideration as part of future environmental reviews, including the program-level studies for the northern mountain crossing (Bay Area to Central Valley) and project-level reviews, when possible impacts (including biodiversity impacts) and on ongoing research can be considered in detail.

Comment Letter O060

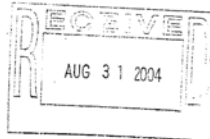
O060



31 August, 2004

Mehdi Morshed, Executive Director
California High Speed Rail Authority
c/o 925 L Street, Ste. 1425
Sacramento, CA 95814

Morshed:



It has come to my attention that the above-referenced has among its proposed alignments, the possibility of the HST going through the parks in The Cornfields, located in northeast Los Angeles adjoining Chinatown and nearby Taylor Yard. One of the affected communities is the Los Angeles neighborhood of Cypress Park, which is where we work.

I would like to register the very strong objections on this issue:

1) There has been no apparent effort to inform the affected communities about this proposal. As President of North East Trees that works in partnership with the local community as well as the environmental there has been absolutely no outreach to our community on this matter. In fact, I just found out about this proposal two days ago and comment must be made by today, 31 August.

2) The Notice of Availability of the Draft Program EIR/EIS is insufficient. Two of the communities that will be directly affected regarding the proposed alignment(s) through Taylor Yard are Cypress Park and Glassell Park. These communities have a predominantly minority population and a large percentage of low-income residents. These residents are not notified during this environmental process and are being slighted.

3) Because of this late notification, there is a apparent inability of the affected communities to review the Environmental Documents and Technical Appendices as well as the Administrative Record, which I am sure are extensive. Our communities have not had the opportunity to review these crucial items nor have the communities had a chance to provide input of any kind.

4) The Cornfield and Taylor Yard need significant analysis per Section 4(F) of the DOT Act of 1966 and it is essential that alternative suggestions and alignments are proposed to the alignment(s) that include the Cornfield and/or Taylor Yard. Unfortunately, because we have not seen the Environmental Document, the Technical Appendices nor the Administrative Record, we have no idea if this has been addressed.

I would like to recommend that the following steps be taken on the above issues before anything pertaining to the HST proceed: There needs to be at least a sixty (60) day period for our communities to have the opportunity to properly review the Environmental Document and Technical Appendices along with the Administrative Record.

This should include well publicized public hearings throughout the Los Angeles area in the communities along each of the proposed alignments. This issue must be brought before the Neighborhood Councils in the City of Los

Angeles, especially those that are affected by the HST so that significant stakeholder input can be heard on this crucial matter.

O060-1 cont.

I thank you in advance for your time and consideration. I look forward to hearing from you.

Sincerely,

Scott Wilson
Scott Wilson, President
North East Trees

O060-1

570 W. Avenue 26, Suite 200, Los Angeles, California 90065 Phone: (323) 441-8634 Fax: (323) 441-8618

North East Trees is a non-profit organization improving communities in Northeast Los Angeles by planting an urban forest.



CALIFORNIA HIGH SPEED RAIL AUTHORITY



U.S. Department
of Transportation
**Federal Railroad
Administration**

Response to Comments of Scott Wilson, President, North East Trees, August 31, 2004 (Letter O060)

O060-01

Public outreach efforts, consistent with federal and state law were made for this programmatic document. A description of the outreach efforts including a listing of the public meetings held as part of this programmatic document process can be found in Chapters 8 (Public and Agency Involvement) and 9 (Organization, Agency and Business Outreach). The noticing of the availability of the draft programmatic EIR/EIS was consistent with state and federal law. Please reference Chapters 8 and 9 for a description of the noticing of the document. Please see standard response 8.1.1 and standard response 8.1.16.

The Cornfield and Taylor Yard Properties are included and addressed in the Final Program EIR/EIS and would be subject to a full 4(f) analysis for the project level environmental document. The greater focus of the subsequent project level analysis will allow for further avoidance and minimization efforts, as well as identification of specific mitigation, if impacts cannot be avoided. The Authority has identified the MTA/Metrolink, which avoids Cornfield property, as the preferred option. Between Burbank and Los Angeles Union Station, the MTA/Metrolink refers to a relatively wide corridor within which alignment variations will be studied at the project level. This option was selected, in part, because it would have fewer potential affects on both the Cornfield Property and the Taylor Yards. Please see standard response 6.24.2.

Comment Letter O061



DEVELOPMENT AUTHORITY

August 30, 2004

The Orangeline Development Authority is a joint exercise of powers agency formed to pursue deployment of the Orangeline maglev system in Southern California. The Authority is composed of the following public agencies:

City of Artesia
City of Bell
City of Bellflower
City of Cerritos
City of Cudahy
City of Downey
City of Huntington Park
City of Los Alamitos
City of Maywood
City of Palmdale
City of Paramount
City of South Gate
City of Vernon

Chairman

Hector De La Torre
Councilmember,
City of South Gate

Secretary

Art Gallucci
City Manager, City of Cerritos

Legal Counsel

Michael Costantino
Columbo & Levin, PC

Treasurer/Auditor

Jack Joseph
Gateway Cities COG

Executive Director

Albert Peron, PE

Supporting Agencies

Gateway Cities Council
of Governments

Southern California
Association of Governments

City of Garden Grove

City of Huntington Beach

City of Long Beach

City of Stanton

Mr. Joseph E. Petrillo, Chairman
and Members
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814
Via Fax Number: (916) 322-0827

Subject: **Comments on California High-Speed Train PEIS/EIR**

The Orangeline Development Authority congratulates the California High Speed Rail Authority for completion of the draft Program Environmental Impact Statement/Environmental Impact Report for the proposed California high-speed train system.

Development of a high-speed train system serving the major population centers of California offers many potential benefits. The economic stimulus resulting from the construction of the system could be an early benefit to the State. The improved access to communities served by the system could be of benefit to the residents of those communities and stimulate economic activity within those communities. The high-speed train system could help to alleviate growing congestion on the State's most heavily traveled highways, airways and airports, and it could provide an alternative to highway and air travel.

The California High Speed Rail Authority's Draft PEIR/EIS reveals many of the key opportunities and issues pertaining to the development of the high-speed train system. The Orangeline Development Authority offers the following input for your consideration. The attached further details our comments on the Draft PEIS/EIR.

1. The plan for staging construction should maximizing benefits and equity – creating early benefits for all Californians O061-1
2. The Authority should reconsider the decision to eliminate maglev technology from further consideration O061-2
3. Planning of the statewide system should be coordinated with the deployment of the intra-regional maglev system in Southern California O061-3
4. The Authority must ensure that the state-wide system serves the needs of local communities and includes a local role in decision-making O061-4

The Orangeline Development Authority is composed of Southern California cities that have joined together to pursue deployment of a high-speed maglev system serving its member cities. The Orangeline would extend from north Los Angeles County to south Orange County. It is included in the SCAG Regional Transportation Plan and is identified in federal transportation reauthorization legislation as a national High Priority Project.

We look forward to working with you to coordinate the planning of our two projects to the benefit of all Californians.

Sincerely,

Hector De La Torre
Hector De La Torre, Chairman

Attachment

<http://orangeline.ca/maglev.org>
16401 Paramount Boulevard
Paramount, California 90723 USA
albertperon@ca/maglev.org
310.871.1113 Phone
562.924.2152 FAX



Attachment

Comments on
California High Speed Rail Authority
Program Environmental Impact Statement/Environmental Impact Report
for the proposed
California High-Speed Train System

1) Maximizing Benefits and Equity – Create early benefits for all Californians

The proposed \$33-37 billion high-speed train system is to be built in stages and would be funded largely through public tax dollars. The proposed sources of funds for the planned initial segment from the San Francisco Bay area to downtown Los Angeles includes a \$10 billion General Obligation bond, a \$5 billion federal grant, federal loan guarantees, airport user fees and passenger facility charges, local funds and existing state gas tax and local sales tax revenues. Thus, the cost of the rail system will be borne by all Californians throughout the State.

The Authority's plan for deploying the system in stages should be balanced to include construction of initial segments in both Northern and Southern California. This approach would create early benefits for both regions of California and ensure a commitment by both regions to connect the northern and southern segments. Building the first segments simultaneously to connect the Bay area with the Central Valley and to connect the Los Angeles region from Palmdale to San Diego would also maximize ridership and revenues. Project revenues from the northern and southern segments could be used to fund construction of the Central Valley connecting segment, much the same way the transcontinental railroad was built and its two segments were joined. This approach would induce higher environmental benefits and reduce the burden on California's taxpayers, thus freeing public dollars for other transportation improvements.

O061-1
cont

2) Maglev Technology – Reconsider the decision to eliminate maglev technology

The Authority should reconsider its decision to eliminate use of maglev technology before finalizing the PEIR/EIS and before making final design and implementation decisions. The PEIR/EIS could be found inadequate and be subject to legal challenge for dismissing maglev as a viable technology. The Authority could risk a lengthy and costly delay in the event of a serious legal challenge. While conventional steel-wheel-on-steel-rail was selected as the preferred technology early in the Authority's feasibility studies, advances in the commercial deployment of maglev technology demonstrate that it is a viable, and perhaps preferable, alternative to steel-wheel-on-steel-rail. Since the federal government is advocating the deployment of maglev technology in the United States, the early dismissal of maglev technology as an alternative does not support the goals of the federal maglev program.

O061-2
cont

In selecting steel-wheel technology, the high-speed train system may create a higher level of adverse impacts on the environment than may be necessary, particularly in noise sensitive areas, due to the higher level of noise emissions associated with steel wheel versus maglev technology. Within the dense urban areas of Southern California and the Bay area, these impacts could be significantly more severe than in less populated areas, such as in the Central Valley. Other potential benefits of

Comment Letter 0061 Continued

maglev technology, such as lower operating costs, higher maximum and average operating speeds and ability to attract higher ridership and net operating revenues, should be seriously considered and disclosed in the PEIR/EIS. The reasons for discounting these benefits and dismissing maglev technology in favor of steel-wheel-on-steel rail technology should be fully disclosed in order to minimize the risk of delays in securing environmental clearances.

0061-2
cont.

3) Alignments – Coordinate planning of the statewide system with the deployment of the intra-regional maglev system in Southern California

The Authority proposes to use the same or similar alignments for many parts of the state high-speed train system that are proposed for the Southern California intra-regional high-speed maglev system. These same corridors are also being viewed for an expanded freight system. The PEIR/EIS should address the potential impact of the state high-speed train system on the other proposed projects. These impacts could include higher costs for either or both the state system and the regional systems. If conflicts are not readily resolved, construction of the state system could preclude development of the other projects. Ridership projections for the statewide system should be updated in the final PEIR/EIS to reflect the impacts of the intra-regional maglev system in Southern California, as that system is shown in the adopted Regional Transportation Plan – including ridership and operating revenue impacts of the maglev system on the state high-speed train system.

0061-3
cont.

4) Decision-making – Ensure that the state-wide system serves the needs of local communities and includes a local role in decision-making

The success of the state high-speed train system will rely on the cooperation of local government agencies, particularly cities with high-speed train stations and through which the trains will pass. Access to the train stations, development around the stations, ridership and revenues are highly dependent upon cooperation from local cities. The Authority must create a formalized role for local government in the decision-making process for planning, building and operating the high-speed train system. Local cities and authorities should be given specified decision-making roles to ensure that the high-speed train system serves the needs of both inter-city travelers and the communities through which they travel. The issues of station locations, alignment, technology, construction staging, etc., would be addressed with local governments having a "seat at the table" with guarantees that local concerns will be adequately addressed. Determinations regarding system alignments and station locations are examples of the issues that should be decided jointly by the Authority and affected local agencies.

0061-4
cont.

**Response to Comments of Hector De La Torre, Chairman, Orangeline Development Authority, August 31, 2004
(Letter O061)**

O061-01

Acknowledged. A plan for staging construction would be prepared after a decision is made to advance the HST system and would be addressed in future project-specific studies. See standard response 10.1.7. Preparation of a financing plan for the proposed HST system is beyond the scope of this program EIR/EIS.

O061-02

Please see standard response 2.10.3.

O061-03

Acknowledged. See Response AL065-1.

O061-04

Acknowledged. The Authority has identified preferred HST alignment and station locations that best meet the purpose and need statement and the objectives for the system, including serving the needs of local communities. The Program EIR/EIS process is a "public" process in which the Authority and the FRA has sought input from local agencies. Please see Chapter 8 "Public and Agency Involvement". The Authority looks forward to continuing to work with local agencies from Los Angeles and Orange County should the HST proposal move forward.



CALIFORNIA HIGH-SPEED RAIL AUTHORITY

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